Veterans Affairs Canada
Anciens Combattants Canada

Annual Report on the Administration of the *Privacy Act*

2012–2013

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Minister of Veterans Affairs

Canada

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1. Introduction

The *Privacy Act* provides members of the public with the legislated right to access and request correction of personal information about them held by federal government institutions. The Act also imposes strict obligations related to the collection, accuracy, use, disclosure, retention and disposition of personal information.

Veterans Affairs Canada (VAC) takes very seriously its responsibility to protect the privacy and rights of all Veterans and their families.

Privacy Action Plan 2.0

In May 2012, the Department launched Privacy Action Plan 2.0 as part of ongoing efforts to strengthen the protection of personal information. Building on the success of the original 10-point privacy action plan announced in October 2010, the new measures in the Privacy Action Plan 2.0 include:

- Providing targeted training on privacy principles;
- Streamlining consent forms;
- Ensuring new initiatives are compliant with privacy requirements; and
- Monitoring and evaluating transactions that involve private information.

Key elements of Privacy Action Plan 2.0 were fully implemented in October 2012. The Department recognizes that building and maintaining a strong privacy-sensitive culture demands ongoing vigilance. VAC is pursuing the highest standards in privacy protection so that all Veterans can be confident their personal information is safe and their rights are being fully respected.

The ongoing maintenance and oversight of the Privacy Action Plan 2.0 provides Veterans with further assurance that the Department is committed to the protection of their personal information.

2012 Audit Report of the OPC

On October 4, 2012, the Privacy Commissioner of Canada published an audit report on the Department's privacy practices. The audit was generally positive. As noted on page 5 of the report:

> "Veterans Affairs Canada has sent a clear signal that privacy is vital to its operations. With committed leadership, structures and control mechanisms in place, the Department is moving from reacting to privacy issues to proactively addressing them."

The report pointed out a number of issues which, if addressed, would further enhance the Department's already significant efforts to safeguard personal information. The Department is

implementing all of the Privacy Commissioner's recommendations as it continues to take action to ensure its privacy practices meet the highest standards. At the end of the 2012–2013 fiscal year, more than half of the audit's recommendations had been fully addressed. The remainder will be completed by May 2013.

This annual report on the administration of the *Privacy Act* outlines how VAC and the Office of the Veterans Ombudsman (OVO) fulfilled their responsibilities under the *Privacy Act* during the fiscal year beginning April 1, 2012 and ending March 31, 2013.

2. Preparation and Tabling of the Annual Report

In accordance with section 72 of the *Privacy Act,* the Minister of Veterans Affairs, as head of the institution, is required to prepare an annual report on the administration of the Act and this report is to be tabled in Parliament.

3. Mandate of Veterans Affairs Canada

Canada's development as an independent country with a unique identity stems partly from its achievements in times of war. VAC exists to assist and help those whose courageous efforts gave us this legacy and contributed to our growth as a nation.

VAC's mandate is set out in the *Department of Veterans Affairs Act*. It charges the Minister of Veterans Affairs with responsibility for:

> "the care, treatment, or re-establishment in civil life of any person who served in the Canadian Forces or merchant navy or in the naval, army, or air forces or merchant navies of Her Majesty, of any person who has otherwise engaged in pursuits relating to war, and of any other person designated ... and the care of the dependants or survivors of any person referred to ..."

Through an Order-in-Council, VAC has responsibility for keeping alive the achievements and sacrifices of those who served Canada in times of war and peace.

Responsibilities
VAC achieves its mandate by providing services and benefits that respond to the needs of Veterans, other individuals and their families.

VAC has three main roles:

Provider of disability compensation and financial support: VAC administers programs which recognize and compensate for the disabling effects of service-related disabilities. The Department also provides financial support and assistance when career-ending or service-related disabilities affect one's ability to earn income.

Funder for health care and re-establishment services: The Department works with other levels of government—federal, provincial and territorial—to provide access to health programs that enhance the well-being of Veterans and other eligible individuals, promote independence and ensure continued care. The Department also provides support to Canadian Armed Forces (CAF) Veterans and their families to ease their transition to civilian life.

Catalyst for national and international remembrance: The Department keeps alive the achievements and sacrifices of those who served Canada in times of war, military conflict and peace, and promotes the importance of these efforts on Canadian life as we know it today. VAC fosters remembrance of the contributions made by Canada's war dead and Veterans through its Canada Remembers program. It also maintains and operates 14 memorial sites in Europe.

What Veterans Affairs Canada Does

Parliamentarians and Canadians firmly believe that Canada should support the men and women who put their lives at risk defending this country and its values. Accordingly, VAC provides services to well over 200,000 people: Veterans, men and women in uniform of the Canadian Armed Forces (CAF), their families, and others. The Department's social and financial programs include disability benefits, allowances, pension advocacy, health care, and commemoration. These programs are intended to recognize the sacrifices of Veterans during times of war and conflict, and to compensate them for the various hardships they suffer—such as physical or emotional disabilities, or lost economic opportunities. VAC also provides a number of innovative health and social services, and legal assistance.

The Department serves a highly diverse population that reflects the remarkable breadth of Canada's contributions to world peace. VAC's mission is to make sure that its services and benefits respond effectively to the needs of the men, women and families VAC serves. Another goal is commemoration: recognizing Veterans' services to this country and keeping alive the memory of their achievements and sacrifices for all Canadians. The Canadians we serve include:

Veterans:

- Armed Forces and Merchant Navy Veterans who served during the Second World War or the Korean War;
- Former and, in certain cases, current members of the Canadian Armed Forces, including those who served in special duty areas and in peacekeeping; and
- Allied Veterans who lived in Canada prior to periods of war.

Other Canadians:

- Certain civilians who are entitled to benefits because of their war-time services;
- Former and, in certain cases, serving members of the Royal Canadian Mounted Police (RCMP); and
- Survivors and dependants of the above-mentioned groups.

As well, VAC's Canada Remembers program ensures that Veterans and those who died in service are honoured and the memory of their sacrifices and achievements is preserved.

Canada Remembers' activities promote the following outcomes: Canadians are knowledgeable about their efforts; Veterans are publicly recognized for their service; communities and other groups lead remembrance activities; symbols erected to their memory are maintained in perpetuity; and, eligible Veterans receive dignified funerals and burials. Encouraging pride in our shared military history, celebrating the contributions and acknowledging the sacrifices of those who served, and preserving symbols to mark their courage all contribute to the Government of Canada's outcome of a vibrant Canadian culture and heritage.

VAC remains strongly committed to upholding the principles of the *Privacy Act*, while providing a high level of service to Veterans and other Canadians.

4. Mandate of the Office of the Veterans Ombudsman

The Office of the Veterans Ombudsman helps Veterans, men and women in uniform of the Canadian Armed Forces, members and former members of the Royal Canadian Mounted Police (RCMP), as well as families and other individuals, address concerns related to VAC and the *Veterans Bill of Rights*. As an impartial and independent officer, the Veterans Ombudsman reports directly to the Minister of Veterans Affairs and works to ensure that Veterans, their representatives and their families are treated fairly.

The mandate of the Ombudsman, found in the *Order-in-Council P.C. 2007-530*, is to:

- Review and address complaints by Veterans and other individuals served (by VAC) and their representatives arising from the application of the provisions of the *Veterans Bill of Rights;*
- Identify and review emerging and systemic issues related to programs and services provided or administered by the Department or by third parties on the Department's behalf that impact negatively on Veterans and other individuals served (by VAC);
- Review and address complaints by Veterans and other individuals served (by VAC) and their representatives related to programs and services provided or administered by the Department or by third parties on the Department's behalf, including individual decisions related to the programs and services for which there is no right of appeal to the Veterans Review and Appeal Board;
- Review systemic issues related to the Veterans Review and Appeal Board; and
- Facilitate access by stakeholders to programs and services by providing them with information and referrals.

5. Organization

I Veterans Affairs Canada Access to Information and Privacy Office

The VAC Access to Information and Privacy (ATIP) Coordinator acts on behalf of the Minister of Veterans Affairs and the Deputy Minister to ensure that the Department's responsibilities under the *Access to Information Act* and the *Privacy Act* are met. The ATIP Coordinator reports directly to the Assistant Deputy Minister, Human Resources and Corporate Services Branch.

The Department takes very seriously its responsibility to protect the privacy and rights of all Veterans, their families and other individuals it serves. The ATIP Office worked with officials all across the Department to strengthen the existing 10-point privacy action plan and develop the Privacy Action Plan 2.0. This Plan builds on the considerable progress the Department has made in safeguarding the personal information of Veterans and their families.

The measures in the Privacy Action Plan 2.0 include the following:

- providing targeted training on privacy principles;
- streamlining consent forms;
- ensuring new initiatives are compliant with privacy requirements; and
- monitoring and evaluating transactions that involve private information.

This next phase of the Privacy Action Plan builds on accomplishments to date, and provides Veterans with the added assurance that their private information remains protected.

The main activities of VAC's ATIP Office include:

- Processing requests for information submitted to the Department under the *Access to Information Act* and the *Privacy Act*;
- Developing policies, procedures and guidelines in support of Access to Information and Privacy legislation and central agency requirements;
- Promoting awareness of both Acts within the Department to ensure employees understand their roles and responsibilities;
- Monitoring departmental compliance with both Acts and central agency requirements;
- Preparing annual reports to Parliament and other statutory reports for the Department and the OVO;
- Coordinating and providing direction to program areas within the Department regarding the completion of Privacy Impact Assessments (PIAs);
- Coordinating the resolution of any complaints against VAC which have been submitted to the Information Commissioner under the *Access to Information Act* and to the Privacy Commissioner under the *Privacy Act;*
- Providing centralized management of breaches of privacy within the Department and OVO;
- Providing advice and guidance to VAC departmental staff on ATIP issues;

- Providing support and recommendations to the Department's Chief Privacy Officer and the Departmental Privacy Committee; and
- Supporting the Department in meeting its commitments to openness and transparency through proactive disclosure of information and the release of information via informal avenues.

Processing of access to information and privacy requests is centralized within the ATIP Office in Charlottetown, Prince Edward Island. The ATIP Office has two units: an Operations team and a Privacy Policy team. A total of 26 full-time equivalents (FTEs) were utilized in 2012–2013 in the processing of requests and the provision of ATIP policy support and advice to the Department.

The ATIP Coordinator's Office supports and maintains a network of 27 ATIP Liaison Officers in each major division and region of the Department (21 Liaison Officers in the Charlottetown Head Office and six in the Regional Offices). The Liaison Officers are responsible for retrieving information from the Office of Primary Interest (OPI) when a request is received. Liaison Officers are also responsible for identifying information which may qualify for an exemption under the Acts.

II Office of the Veterans Ombudsman Access to Information and Privacy Unit

On April 24, 2012, the Minister of Veterans Affairs delegated the Veterans Ombudsman, Director General, Legal Advisor, and Director, Corporate Services and Charlottetown Operations full authority to exercise the powers, duties, and functions of the Minister as the head of Veterans Affairs, under the provisions of the Act and related regulations for the OVO (see Annex 1). Although four positions have been delegated full authority, the Veterans Ombudsman has been identified as the senior-most official within the OVO responsible for Access to Information and Privacy. The Director, Corporate Services and Charlottetown Operations is responsible for operational management of the Access to Information and Privacy functions within the OVO.

During the 2012–2013 reporting period, the OVO established an Access to Information and Privacy Unit in Charlottetown, Prince Edward Island. The unit was formed to ensure that the Office's responsibilities under both Acts are met. Processing of requests is centralized within this new unit. The unit consists of the Director, Corporate Services and Charlottetown Operations, ATIP Coordinator, and a Liaison Officer. A Legal Advisor supported by a casual resource are responsible for the final review and release of information to the requester. These four full-time staff members and one casual resource were assigned to the administration of both Acts on a part-time basis during the 2012–2013 reporting period.

The main activities of the OVO ATIP unit include:

- Processing requests received for information under the *Access to Information Act* and the *Privacy Act* in compliance with ATIP legislation, regulations and Treasury Board Secretariat policy instruments;

- Developing OVO policies, procedures, guidelines, and processes in support of Access to Information and Privacy legislation and central agency requirements;
- Promoting awareness of both Acts within the OVO to ensure that employees understand their roles and responsibilities;
- Monitoring OVO compliance with both Acts, and central agency requirements;
- Preparing and providing information specific to the OVO to the Department for inclusion in Annual Reports to Parliament and other statutory reports, as well as other material that may be required by central agencies;
- Completing and coordinating the completion of Privacy Impact Assessments (PIAs) for the OVO;
- Coordinating the resolution of any complaints against OVO made to the Information Commissioner under the *Access to Information Act* and to the Privacy Commissioner under the *Privacy Act;*
- Supporting the OVO in meeting its commitments to openness and transparency through proactive disclosure of information and the release of information via informal avenues;
- Supporting the Department in their role in providing centralized management of breaches of privacy with respect to any breaches of privacy within the OVO.

In order to implement the new Memorandum of Understanding and delegation order, the OVO developed a new Access to Information and Privacy governance structure, defined roles and responsibilities, and developed operational processes during the 2012–2013 reporting period.

6. Delegation Order

The responsibilities associated with the administration of the *Privacy Act* are designated to departmental officials and OVO officials through a delegation order signed by the Minister of Veterans Affairs.

On April 24, 2012, the Minister signed new delegation orders for the *Access to Information Act* and the *Privacy Act.* The *Privacy Act* delegation order (attached as Annex 1) was in place for fiscal year 2012–2013.

7. Interpretation of the *Privacy Act* Statistical Report

The Statistical Report on the *Privacy Act* (Annex 2) provides aggregate data on the administration of the *Act.* A roll-up of VAC and the Office of the Veterans Ombudsman (OVO) data on requests completed between April 1, 2012 and March 31, 2013 is provided in the Statistical Report included in Annex 2. The Report also includes the number of requests received and requests carried over, during the reporting period.

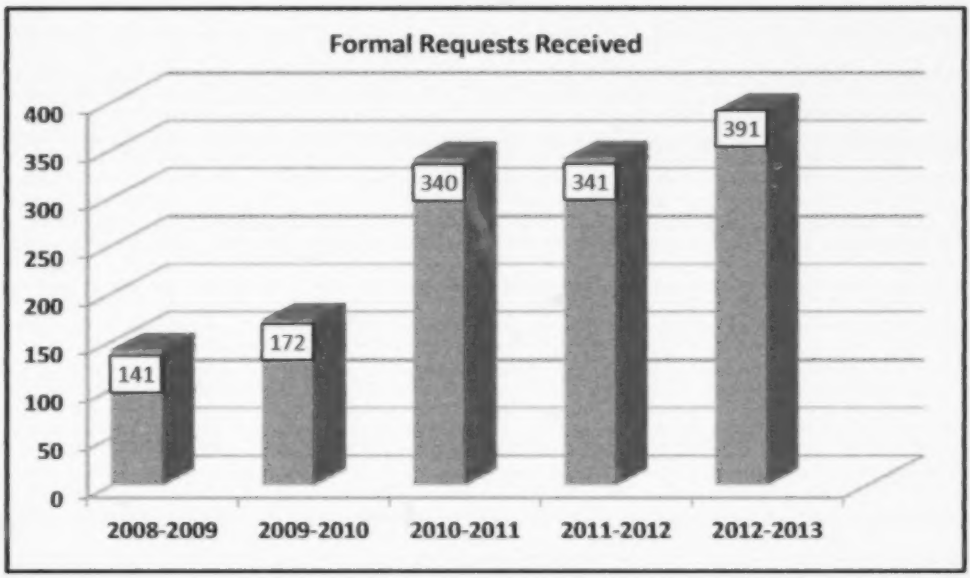
The following provides explanations and interpretations of the statistical data in Annex 2.

Note: During 2012–2013, the new delegation order (see Annex 1) came into effect and the Office of the Veterans Ombudsman began to track all statistical information for the OVO. The

Statistical Report which contains only data pertaining to the Office of the Veterans Ombudsman is included in Annex 3. In the first year of operations for the new OVO-ATIP unit, no formal privacy requests were received directly by the unit. There were, however, costs associated with establishing ATIP operations within the OVO and the completion of a PIA. Privacy requests relating to the OVO that were received and closed during 2012–2013 under the former delegation order were tracked by VAC (as in the past) and are included in information provided in Annex 2.

I Formal Requests Under the *Privacy Act*

As outlined in the following table, between April 1, 2012 and March 31, 2013, the Department received 391 formal requests for information under the *Privacy Act*. This represents an increase of 50 requests (or 15%) from the 341 received in the 2011–2012 fiscal year; and the 340 received in the 2010–2011 fiscal year (see Annex 4 for a five-year comparison).



On April 1, 2012, VAC had 173 open requests which were carried forward from the previous year. These requests, combined with the 391 requests received in 2012–2013, totalled 564 requests requiring action during the 2012–2013 fiscal year. A total of 272 requests were completed by the Department during the reporting period. As of the end of the fiscal year, there were 292 outstanding formal requests that have been carried forward to the 2013–2014 fiscal year. As evidenced by the number of requests carried forward, VAC continues to deal with the pressure of the large number of requests received over the past three years.

In the 2012–2013 fiscal year, VAC implemented the Privacy Action Plan 2.0 and increased focus on ATIP activities such as information management, privacy impact assessments, management oversight, and awareness and training. The Department is committed to upholding privacy

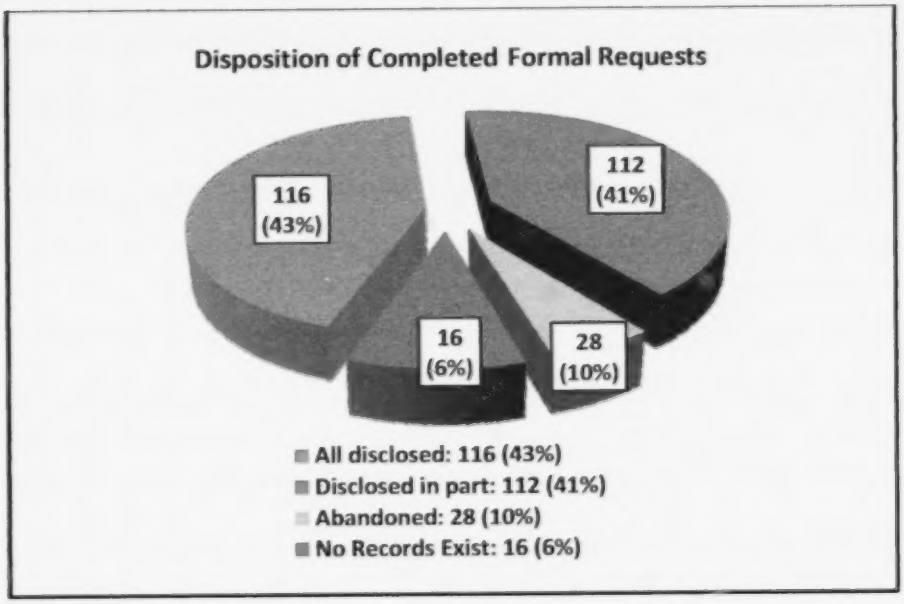
protection and the right of access to personal information and government information as granted through the *Privacy Act* and *Access to Information Act*.

To address this commitment, the Department has responded by investing significantly in ATIP in the 2012–2013 fiscal year, increasing resources by 50% (from 20 to 31) in January 2013. This added capacity positions the Department well to deal with requests for information and other ATIP activities in the upcoming fiscal year.

II Disposition of Requests Completed

In total, 272 formal requests were completed during the 2012–2013 fiscal year compared to 262 requests completed in the 2011–2012 fiscal year. This is a 4% increase in the number of requests completed.

The disposition of the 272 requests completed in 2012–2013 is illustrated in the following chart:



III Exemptions Cited

Although Canadians have a right of access to their personal information, the *Privacy Act* identifies specific exemptions for which the need for confidentiality of certain information is recognized. The following table identifies the number of requests where specific types of exemptions were applied.

Exemptions Cited	2010–2011	2011–2012	2012–2013
Section 21 (International Affairs and Defence)	0	0	1
Paragraph 22(1)(a)(*i*) (Law Enforcement and Investigation)	0	1	1
Paragraph 22(1)(b) (Law Enforcement and Investigation)	1	0	0
Section 26 (Information about another individual)	162	154	103
Section 27 (Solicitor-Client Privilege)	5	2	9
Section 28 (Medical Records)	2	0	2
Total Exemptions Cited	**170**	**157**	**116**

VAC invoked 116 exemptions under sections 21, 22, 26, 27 and 28 of the *Privacy Act*. This is a decrease of 41 exemptions (26%) over the number of exemptions applied in the 2011–2012 fiscal year. The most frequently applied exemption was section 26 which is used to protect information about an individual other than the requester. Although section 26 was the most frequently applied exemption in 2012–2013, invoked 103 times, it is being applied less often due to a change within the Department's ATIP Office so that personal information about the requester's family (such as a spouse's name, the names of children and the medical information of children who are under 18 years of age) is now disclosed rather than being severed.

For statistical purposes in the table above, it is important to note that when an exemption is applied to a file multiple times, the exemption is counted only once.

IV Exclusions Cited

Pursuant to sections 69 and 70, the *Privacy Act* does not apply to published material, material available for purchase by the public, material placed in the Library and Archives of Canada or confidences of the Queen's Privy Council for Canada. During this reporting period, there were no exclusions to report.

V Completion Time

During the 2012–2013 reporting period, VAC completed 109 formal requests in 30 days or less; 44 requests were completed within 31 to 60 days; 27 requests were completed within 61 to 120 days; and 92 requests were completed in 121 days or more. A total of 140 requests, or 51%, were completed within the legislated time frame. This represents an increase of 31 requests, or 9%, over the 2011–2012 reporting period.

2012-2013 Formal Request Completion Time
44 (16%)
27 (10%)
92 (34%)
109 (40%)
30 days or less: 109 (40%)
31 to 60 days: 44 (16%)
61 to 120 days: 27 (10%)
121 days or more: 92 (34%)

As noted in section 2.6.1 of the Statistical Report on the *Privacy Act* (Annex 2), workload is identified as the principal reason for not meeting statutory deadlines. The Department is committed to privacy protection and has implemented Privacy Action Plan 2.0 and increased focus on ATIP activities such as information management, PIAs, management oversight, and awareness and training.

As previously noted, to address this challenge, the Department has responded by investing significantly in ATIP in the 2012–2013 fiscal year; increasing resources by 50% (from 20 to 31) in January 2013. This added capacity positions the Department well to deal with the increased volume in the upcoming fiscal year.

VI Extensions

During the reporting period a total of 62 requests were extended. Of these, seven were extended because the processing of the file within the original timelines would have unreasonably interfered with the operations of the Department. The other 55 were for the purpose of consultation with other institutions.

VII Translations

There was one privacy request that required translation during the 2012–2013 reporting period. As a comparison, there were no privacy requests requiring translation during the 2011–2012 reporting period and only one during the 2010–2011 reporting period.

VIII Method of Access

There are three methods of access whereby individuals may obtain the information they have requested under the *Privacy Act*. Requesters may receive copies of the material, examine the information during an arranged time, or examine and receive copies of the information. Of the 272 formal requests completed, applicants received copies of the material they had requested (either fully or in part) in 228 cases. In the remaining 44 cases, the requests were either abandoned by the applicant (28) or could not be processed because records did not exist (16).

Method of Access	2010–2011	2011–2012	2012–2013
Copies of material in full or in part	218	220	228
Abandoned by applicant	17	13	28
No records exist	14	9	16
Transferred to another institution	10	19	0
Nothing disclosed (exemption or exclusion)	0	1	0

IX Corrections and Notations

Under the *Privacy* Act, individuals are entitled to request correction and notation of their personal information where the individual believes there is an error or omission therein. Two requests for corrections were received during the 2012–2013 reporting period. One correction was denied because substantiating documentation was not provided by the requester and one correction was abandoned by the requester.

X Costs

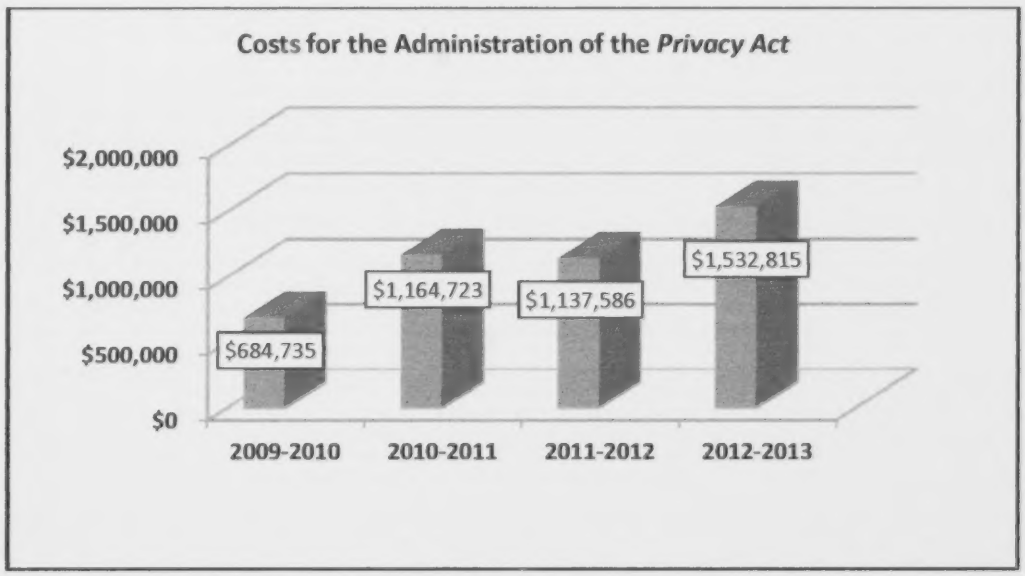
The VAC and OVO ATIP Offices spent a combined total of $1,532,815 to administer the *Privacy Act* during the reporting period. Staff salaries accounted for $1,269,552, while costs of Privacy Impact Assessment (PIA) contracts amounted to $131,037, and other administrative costs, such as training, travel and supplies, totalled $132,226.

In the 2012–2013 fiscal year, VAC implemented the Privacy Action Plan 2.0 and increased focus on ATIP activities such as information management, PIAs, management oversight, and awareness and training. The Department is committed to upholding privacy protection and the right of access to personal information and government information as granted through the *Privacy Act* and *Access to Information Act*.

To address this commitment, the Department has responded by investing significantly in ATIP in the 2012–2013 fiscal year; increasing resources by 50% (from 20 to 31) in January 2013. This added capacity positions the Department well to deal with requests for information and other ATIP activities in the upcoming fiscal year.

Office of the Veterans Ombudsman

The OVO spent a total of $87,828 administering the *Privacy Act* during the 2012–2013 reporting period. Staff salaries accounted for $54,522. Two full-time resources and 0.5 of a casual resource dedicated approximately 15% of their time to privacy activities during the 2012–2013 reporting period. The OVO engaged an external consultant to conduct a PIA which accounted for $31,050, and incurred other goods and services costs (training, travel, and supplies) which accounted for $2,226 during the 2012–2013 reporting period. Costs for this initial year in operations were primarily associated with establishing the new ATIP unit within the OVO.



8. Other ATIP Functions

I Veterans Affairs Canada

The ATIP Office provides other services in addition to formal requests submitted under the *Privacy Act*. One such service is responding to informal requests; that is, requests which do not invoke the right of access provided by the *Privacy Act*. VAC's ATIP Office processed 245 informal privacy requests in the 2012–2013 fiscal year which resulted in over 44,700 pages being disclosed to requesters.

In addition to processing *Access to Information Act* and *Privacy Act* requests, the ATIP Office also handled a variety of requests from within the Department, including policy questions; reviewed new forms for the collection of personal information and development of appropriate Privacy Notice Statements for these forms; evaluated contracts and Memoranda of Agreement; and provided support in preventing, addressing, and containing potential privacy breaches.

II Office of the Veterans Ombudsman

No informal requests were processed by the OVO during the 2012–2013 reporting period.

9. Consultations

I Veterans Affairs Canada

VAC received two requests for consultations from other government institutions or other organizations during the 2012–2013 reporting period. Both consultations were still in progress at the close of the fiscal year.

Of the cases that were completed during the 2012–2013 reporting period, 50 consultations were sought from other government institutions.

II Office of the Veterans Ombudsman

No consultations from other government institutions or other organizations were received by the OVO during the 2012–2013 reporting period.

10. Privacy Training and Awareness

I Veterans Affairs Canada

During the 2012–2013 fiscal year, the Department provided ATIP related training to staff through a variety of mediums. Over the course of the year, privacy training was delivered to 1,760 participants. This demonstrates the commitment of the Department to further enhance VAC's privacy protection culture. In 2012, VAC launched the Privacy Action Plan 2.0. This Plan builds on the success of deliverables that were implemented in the original 10-Point Plan of 2010. The Privacy Action Plan 2.0 works to fully integrate privacy protection as part of the Department's overall management framework. This means looking at privacy in the context of five key management areas and activities:

Training and Awareness

- Deliver renewed privacy principles training to VAC employees and targeted training to promote a dialogue on privacy practices.
- Launch outreach activities with Veterans, other individuals served by VAC, and the Veteran community to promote an understanding of their rights and the Department's obligations related to the *Privacy Act*.

Governance

- Continue to hold regular Departmental Privacy Committee meetings to review and advise on departmental priorities and privacy risks.
- Focus on developing proactive privacy guidance to address privacy risks at the planning phase.

Administration and Practices

- Streamline consent forms and clarify privacy notification statements to increase transparency with respect to VAC's privacy management practices.
- Conduct privacy reviews and assessments related to key transformation initiatives (e.g. My VAC Account) and other VAC programs and activities.

Monitoring and Evaluation

- Monitor and evaluate whether privacy goals are being met with respect to privacy compliance and the management of personal information.
- Action findings and recommendations resulting from the Office of the Privacy Commissioner's audit of VAC's privacy practices.

Reporting and Priority Identification

- Report regularly on the results of monitoring and evaluations to senior management within the Department and to the public through VAC's Annual Report on the administration of the *Privacy Act*.

The Privacy Action Plan 2.0 advances a deeper understanding of privacy and the need to protect personal information at all levels throughout the Department. The Phase II Privacy Performance Management Plan identifies strategic outcomes, key priorities as well as ongoing activities for each management area. Performance indicators are also identified to ensure that quantitative measures are available to assess achievement of desired outcomes.

Privacy Fundamentals Training

In an effort to help increase employees' knowledge and understanding of generally accepted privacy principles, the intent and application of departmental policies, and the procedures to manage Veterans' personal information, the ATIP Office expanded its privacy awareness program to include the Privacy Fundamentals Training.

Privacy Fundamentals is a self-directed learning program that provides participants with an overview of the fundamental concepts related to privacy and personal information management at VAC.

Privacy Fundamentals was launched on June 28, 2012, and is available to all employees at their desktop computer. In total, 133 participants have confirmed completion of the Privacy Fundamentals Training during the fiscal year.

Manager and Supervisor Orientation Program (MSOP)

A new presentation and a new chapter specific to ATIP in the MSOP Manual were developed during the fiscal year. The ATIP Office delivered an hour-long session during two MSOP courses, with a total of 41 participants.

Integrated Security / Privacy Training

The mandatory Security Orientation Training offered to staff highlights the Need to Know Principle, introduces the concept of privacy breaches, the rules around accessing information, and disciplinary actions in regards to unauthorized access to personal information, as well as a general overview of ATIP legislation and fundamentals. New ATIP material has been integrated into the Security Orientation Training Sessions during this fiscal year. A total of 1,312 participants attended 165 sessions (Head Office: 91 sessions for 730 employees; teleconferences with regions: 74 sessions for 582 employees).

Privacy Corner – Wiki

In October 2012, the ATIP Office launched VAC's Privacy Corner Wiki. The Wiki contains a number of resources available to provide guidance on the interpretation and requirements of the *Access to Information Act* and *Privacy Act*, as well as a single access point for information and tools with respect to personal information and privacy within VAC. The Privacy Corner can be accessed through the departmental intranet site which is available to all employees on their desktop computer. The Privacy Corner is an efficient and effective way for all VAC staff to readily find privacy related materials, such as policies, directives, guidelines, privacy updates, learning materials and so much more. The ATIP Office provides new and updated materials to all VAC staff on a regular basis through the Wiki.

Data Privacy Day

On January 28, 2012, VAC's ATIP Office promoted Data Privacy Day with a national poster campaign. ATIP Liaison Officers across the country also played an important role in promoting Data Privacy Day by displaying posters within their respective locations. An awareness article was also published on VAC's Privacy Corner Wiki.

Liaison Officer Training

Liaison Officers who support ATIP activities were invited to Liaison Officer Training led by the ATIP Director. The April 30, 2012 session had 34 staff in attendance.

Further Liaison Officer training was offered in the fall of 2012. Specifically, three sessions were held on the following dates: October 23, 2012 – 20 participants; November 5, 2012 – 16 participants; and November 13, 2012 – two participants.

Privacy Breaches

A presentation on privacy breaches was delivered to the Departmental Privacy Committee (DPC) members at the July 17, 2012 meeting –18 participants were present.

Notice and Consent

A "Use of Notice and Consent" training session was held to introduce a new policy and business process. In total, 12 consent sessions were delivered to 160 staff.

Personal Information Banks

One information session was held for 16 participants who were the program leads on creating and approving their respective Personal Information Banks. The ATIP Director and privacy policy staff delivered the session.

Privacy Session with Bureau of Pensions Advocates (BPA)

One information session was held for eight Advocacy Officers at their off-site meeting.

II Office of the Veterans Ombudsman

Introductory Access to Information and Privacy (ATIP) Training was provided to all 36 OVO staff, and the ATIP unit attended training specific to ATIP specialists during the 2012–2013 reporting period.

A new OVO ATIP website was also launched during the 2012–2013 reporting period to inform requesters of their rights under both Acts, how to submit a request to the OVO ATIP Unit and to report publicly on completed Privacy Impact Assessments (PIAs).

11. Policies, Guidelines and Procedures

I Veterans Affairs Canada

The Department implemented or revised the following policies and guidelines, related to privacy, in the 2012–2013 fiscal year.

- In May 2012, revisions were made to the Privacy Impact Assessment (PIA) process. A new process was implemented to assist staff with determining if a PIA should be considered.
- The "Information Sharing Agreements Guideline with Checklist" was finalized and implemented. This guideline is assisting staff who are responsible for creating and updating Information Sharing Agreements, including Memoranda of Understanding and Program Arrangements. The document was published on the VAC intranet in June 2012.
- VAC's Policy on the Use of Privacy Notices and Consent was finalized and implemented in September 2012. Communications on the new policy as well as a National Business Process were sent to staff and posted on the VAC intranet.

II Office of the Veterans Ombudsman

Access to Information and Privacy (ATIP) procedures and processes were developed to support OVO's new responsibilities identified in the new delegation order during the 2012–2013 reporting period. This information was also communicated to staff through a newly developed OVO-Wiki ATIP page.

12. Complaints and Investigations

I Veterans Affairs Canada

In 2012–2013 the Privacy Commissioner received 48 complaints against VAC and 22 complaints were carried over from 2011–2012 for a total of 70 complaints requiring attention. Fifteen complaints received a ruling during the reporting period and 55 have been carried over to 2013–2014. Of the complaints that received a ruling, four were deemed "not well founded" and 11 were ruled as "well founded".

In the 2012–2013 fiscal year, VAC implemented the Privacy Action Plan 2.0 and increased focus on ATIP activities such as information management, privacy impact assessments, management oversight, and awareness and training. The Department is committed to upholding privacy protection and the right of access to personal information and government information as granted through the *Privacy Act* and *Access to Information Act*.

To address this commitment, the Department has responded by investing significantly in ATIP in the 2012–2013 fiscal year; increasing resources by 50% (from 20 to 31) in January 2013. This added capacity positions the Department well to deal with requests for information and other ATIP activities in the upcoming fiscal year.

As well, section 16 of this report "Strengthening Privacy Management at Veterans Affairs" details the robust oversight and management mechanisms in place to protect privacy and personal information.

II Office of the Veterans Ombudsman

No complaints against the OVO were received by the Privacy Commissioner during the 2012–2013 reporting period.

13. Privacy Impact Assessment (PIAs)

I Veterans Affairs Canada

In accordance with the Treasury Board Secretariat's Directive on PIAs, VAC conducts Privacy Impact Assessments (PIAs) on new programs, systems or policies, or when substantial modifications are made to an existing program, system or policy, and in circumstances where services are contracted to another party. The purpose of a PIA is to ensure that privacy implications or risks will be appropriately identified, assessed and resolved before a new or substantially modified program or activity involving personal information is implemented. Initiatives are assessed and, when possible privacy concerns are identified, a mitigation strategy is developed to eliminate or lower the risk.

In May 2012, a revised PIA process was implemented to assist staff with determining if a PIA should be conducted. If it is determined that a PIA is required, the new process outlines the steps to follow, requirements for consultations, and the approval process. During the 2012–2013 fiscal year eight PIAs (seven VAC and one OVO) were submitted to the Office of the Privacy Commissioner (OPC) and Treasury Board Secretariat (TBS). A description of each initiative is provided below and VAC's PIA summaries can be found at: www.veterans.gc.ca/eng/department/reports/pia

Bomber Command
A new Bomber Command honour has been created. The honour is in the form of a bar to be worn on the ribbon of the Canadian Volunteer Service Medal (CVSM). With this bar, Canada is honouring those Canadians who fought for peace, freedom and democracy through their service in Bomber Command, and in particular the approximately 10,000 who made the ultimate sacrifice.

The existing Order-in-Council governing the Canadian Volunteer Service Medal has been amended to include the eligibility criteria and the description of the new Bomber Command honour. All Canadian Veterans who were awarded the CVSM and served a minimum of one day with Bomber Command, regardless of rank or role, are eligible for this new bar. Loved ones of a deceased Canadian Bomber Command Veteran who hold the Veteran's CVSM may also apply to receive this bar.

For more information on Canada's role in Bomber Command, to apply online for the honour, or to download a hardcopy of the application form, please visit veterans.gc.ca.

VAC's Privacy Impact Assessment explored the initiative to assess the privacy impacts. The PIA for this initiative has been submitted to TBS and the OPC.

Centralized Mail

With a streamlined centralized mail process, Veterans will no longer have to worry about where to send their mail. Most incoming mail to the Department will be sent to Matane, Quebec by 2014, making it easier for Veterans to send their mail where it needs to be. The consolidation of departmental addresses will happen in phases.

VAC is partnering with Public Works Government Services Canada (PWGSC) to help centralize the mail process. PWGSC's Document Imaging Services in Matane, Quebec allows departments to modernize and green their operations by replacing paper copies with digital information and to improve their client service by having electronic access to information.

Because of this modernization, VAC employees are now able to process the same information simultaneously. Veterans will not be required to resubmit documentation and this centralization will contribute to faster decision-making and turnaround times for Veterans and their families.

The PIA identified the need to update program specific Personal Information Banks which are available to assist individuals exercise their rights under the *Access to Information Act* and the *Privacy Act*. The PIA for this initiative has been submitted to TBS and the OPC.

My VAC Account

My VAC Account is a secure, online service that allows Veterans and other individuals served by VAC to communicate with VAC through secure messaging and conduct business with VAC online. The service is designed to give Veterans convenient and secure access to the Department, from anywhere, any day and any time.

Among other things, My VAC Account allows Veterans and other individuals served by VAC to:

- Communicate with the Department through a secure messaging system;
- Change their address or direct deposit details;
- Complete certain applications online; and
- Inquire on the status of their application(s) for disability benefits.

VAC will continue to add features to My VAC Account in the future to make VAC's programs and services even more accessible and convenient. Veterans and RCMP Members can register online anytime or in person or via telephone. A VAC agent is available from Monday to Friday between 8:30 a.m. and 4:30 p.m. at VAC's toll-free number 1-866-522-2122. If outside of Canada, Veterans and RCMP Members can use the Contact Us link on the VAC website.

As new features were planned to be added to the My VAC Account service, a new PIA was completed. A risk management plan has been implemented and the PIA has been submitted to TBS and the OPC.

Ste. Anne's HR Planning

Ste. Anne's Hospital is recognized around the world for its expertise in geriatrics and mental health. With the potential Ste. Anne's Hospital transfer from VAC to the Government of Quebec, Veterans will continue to receive exceptional care in this centre of excellence on the leading edge of clinical innovation. The transfer of Ste. Anne's Hospital will provide long-term benefits to Veterans, Hospital staff and Quebec residents alike. There is a declining demand for long-term care beds for traditional Veterans at the Hospital. Transferring Ste. Anne's Hospital to the Government of Quebec will help to maintain and maximize the Hospital's expertise in geriatrics and psychogeriatrics, and provide bed availability for others.

The PIA completed in 2012–2013 assessed the privacy impacts of sharing Human Resources information with the Government of Quebec. This PIA has been submitted to TBS and the OPC. An additional PIA on the entire scope of the transfer is to be completed in the 2013–2014 fiscal year.

Service Canada Partnership

Canada's Veterans can access services in more locations through a new partnership between VAC and Service Canada. The objective of the partnership is to provide increased access for Canadians, including Veterans and their families, to general information on VAC's programs and services through Service Canada's in-person network of offices and Scheduled Outreach sites. This partnership with Service Canada provides Veterans with approximately 600 points of service across the country. In addition to obtaining services through Service Canada, Canadians can continue to access information about VAC programs and services online at veterans.gc.ca or in-person at VAC offices and Canadian Forces Bases across Canada.

The PIA assessed the initiative to identify risks to personal information and implement changes to remove or mitigate the risks. This PIA has been submitted to TBS and the OPC.

Service Health Records Digital Imaging

Various technologies have been identified to aid in meeting the Service Delivery Branch's commitment to modernize and improve the delivery of services to Veterans and other individuals, partnerships and opportunities. Utilizing modern digital imaging technology, service health records are now being transferred to an electronic format by Public Works and Government Services digital imaging centre in Matane, Québec. This allows VAC employees

immediate access to records, regardless of physical location, in order to begin processing applications for benefits and services to meet the needs of the Veteran or other individual served by VAC.

Digital Imaging will lead to:

- Reduced disability program wait times;
- Decreased number of recalled records from LAC;
- Simultaneous access by all authorized users for multiple purposes, e.g., processing, status update, reporting; and
- Partnerships with Public Works & Government Services Canada and LAC.

The PIA identified a number of risks for which measures were recommended and implemented to address the issues. This PIA has been submitted to TBS and the OPC.

Client-Reported Outcomes Monitoring Information System (CROMIS)

CROMIS is a national, web-based software suite that supports ongoing, session-by-session client-reported mental health outcomes tracking. Although the client reports the outcomes, the data base does not have information that can be used to identify the Veteran or other individual served by VAC. The approach is to monitor important mental indicators to prevent deterioration and/or premature drop-out, by accurately identifying those at risk and providing actionable, "just-in-time" evidence-informed recommendations to client and clinician alike. The software (OQ-Analyst) has been demonstrated in randomized controlled trials not only to facilitate clinical performance monitoring in mental health care systems, but also to actually improve the clinical outcomes of Veterans and other individuals otherwise vulnerable to deterioration and/or premature termination.

The National Centre for Operational Injuries at VAC is using this client-reported outcome monitoring system to better evaluate the effectiveness of the Operational Stress Injury Clinic Network.

The PIA assessed the initiative to identify risks to personal information and implement changes to remove or mitigate the risks. This PIA has been submitted to TBS and the OPC.

II Office of the Veterans Ombudsman

During the 2012–2013 reporting period, the OVO completed a PIA as a pro-active measure to assess the Office's privacy practices with respect to its core mandate to ensure that privacy is appropriately considered and designed into business processes. The approved PIA was provided to Treasury Board Secretariat (TBS) and simultaneously to the Office of the Privacy Commissioner with a modified Personal Information Bank (PIB) description. A summary of this PIA can be found at www.ombudsman-veterans.gc.ca/atip-aiprp/pia-efvp-eng.cfm.

The OVO also developed a PIA Risk Mitigation Action Plan to implement measures to mitigate the risks identified in the PIA, and developed a new PIA section on the OVO website to report publicly on the PIA and progress on the action plan.

14. Disclosures Pursuant to Paragraph 8(2)(m)

I Veterans Affairs Canada

There were no disclosures of personal information pursuant to paragraph 8(2)(*m*) of the *Privacy Act* during the reporting period.

II Office of the Veterans Ombudsman

There were no disclosures of personal information pursuant to paragraph 8(2)(*m*) of the *Privacy Act* during the 2012–2013 reporting period.

15. Appeals to the Courts

I Veterans Affairs Canada

VAC has no appeals to the courts to report for the reporting period, April 1, 2012 to March 31, 2013.

II Office of the Veterans Ombudsman

The OVO has no appeals to the courts to report for the reporting period, April 1, 2012 to March 31, 2013.

16. Strengthening Privacy Management at Veterans Affairs

In May 2012, the Department launched Privacy Action Plan 2.0 as part of ongoing efforts to strengthen the protection of personal information. Building on the success of the original 10-point privacy action plan announced in October 2010, the new measures in the Privacy Action Plan 2.0 include:

Training and Awareness

- Deliver renewed privacy principles training to VAC employees and targeted training to promote a dialogue on privacy practices.
- Launch outreach activities with Veterans, other individuals served by VAC, and the Veteran community to promote an understanding of their rights and the Department's obligations related to the *Privacy Act*.

Governance

- Continue to hold regular Departmental Privacy Committee meetings to review and advise on departmental priorities and privacy risks.
- Focus on developing proactive privacy guidance to address privacy risks at the planning phase.

Administration and Practices

- Streamline consent forms and clarify privacy notification statements to increase transparency with respect to VAC's privacy management practices.
- Conduct privacy reviews and assessments related to key transformation initiatives (e.g. My VAC Account) and other VAC programs and activities.

Monitoring and Evaluation

- Monitor and evaluate whether privacy goals are being met with respect to privacy compliance and the management of personal information.
- Action findings and recommendations resulting from the Office of the Privacy Commissioner's audit of VAC's privacy practices.

Reporting and Priority Identification

- Report regularly on the results of monitoring and evaluations to senior management within the Department and to the public through VAC's Annual Report on the administration of the *Privacy Act*.

The Privacy Action Plan 2.0 advances a deeper understanding of privacy and the need to protect personal information at all levels throughout the Department. The Phase II Privacy Performance Management Plan identifies strategic outcomes, key priorities as well as ongoing activities for each management area. Performance indicators are also identified to ensure that quantitative measures are available to assess achievement of desired outcomes.

Key elements of Privacy Action Plan 2.0 were fully implemented in October 2012. The Department recognizes that building and maintaining a strong privacy-sensitive culture demands ongoing vigilance. VAC is pursuing the highest standards in privacy protection so that all Veterans can be confident their personal information is safe and their rights are being fully respected.

An independent audit of the Department's privacy practices was published by the Privacy Commissioner of Canada in October 2012. Overall, the report was positive and recognized the progress the Department has made. The audit proposed additional measures which, if adopted, would further enhance the Department's already significant efforts to safeguard personal information. The Department is implementing all of the Privacy Commissioner's recommendations. In fact, more than half of these recommendations have already been fully implemented, and the remaining recommendations will be implemented by May 2013.

On page 5 of her audit report, the Privacy Commissioner wrote: "Veterans Affairs Canada has sent a clear signal that privacy is vital to its operations. With committed leadership structures and control mechanisms in place, the Department is moving from reacting to privacy issues to proactively addressing them."

Canada's Veterans have a long and proud history of defending our country's shared values and individual rights. New privacy measures implemented in 2012–2013 are another example of the Department's determination to do the same for Canada's heroes.

Annex 1: VAC and OVO Delegation Order – *Privacy Act* and Privacy Regulations

Delegation Order - *Privacy Act* and *Privacy Regulations*

The Minister of Veterans Affairs, pursuant to section 73 of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the Minister as the head of Veterans Affairs Canada, under the provisions of the Act and related regulations set out in the schedule below. This designation replaces all previous delegation orders.

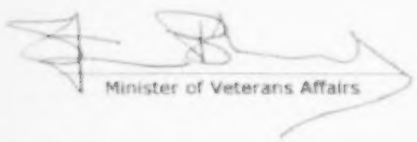
Privacy Act **Provisions and associated descriptions**		**Column 1** Deputy Minister and Associate DM	**Column 2** All Assistant Deputy Ministers, the Director General of Communications and senior management positions within the Department of Veterans Affairs Canada that reports directly to the positions outlined in Column 1	**Column 3** Privacy Coordinator within the Department of Veterans Affairs Canada	**Column 4** Any senior analyst position (PM-05 or above) within Department of Veterans Affairs that reports directly to the position outlined in Column 3	**Column 5** Any analyst position within the Access to Information and Privacy (ATIP) of the Department of Veterans Affairs that reports directly to the positions outlined in Column 4
8(2)(j)	Disclosure for research or statistical purposes	X	X	X		
8(2)(m)	Disclosure in the public interest or in the interest of the individual	X				
8(5)	Notice of disclosure under paragraph 8(2)(m)	X				
9(4)	Consistent uses	X	X	X	X	
10	Personal information banks	X	X	X	X	
14(a)	Notice when access requested	X	X	X	X	
14(b)	Giving access to the record	X	X	X	X	
15	Extension of time limits	X	X	X	X	X
17(2)(b)	Language of access	X	X	X	X	X
17(3)(b)	Access in an alternative format	X	X	X	X	X
18(2)	Exempt banks	X	X	X	X	

19	Information obtained in confidence	X	X	X	X	
20	Federal-provincial affairs	X	X	X	X	
21	International affairs and defence	X	X	X	X	
22	Law enforcement and investigations	X	X	X	X	
23	Security clearances	X	X	X	X	
24	Individuals sentenced for an offence	X	X	X	X	
25	Safety of individuals	X	X	X	X	
26	Information about another individual	X	X	X	X	
27	Solicitor-client privilege	X	X	X	X	
28	Medical records	X	X	X	X	
31	Notice of intention to investigate	X	X	X		
33(2)	Right to make representations	X	X	X	X	
35(1)	Notice of actions to implement recommendations of Commissioner	X	X	X		
35(4)	Access to be given to complainant	X	X	X	X	
36(3)(b)	Notice of actions to implement recommendations of Commissioner concerning exempt banks	X	X	X		
51(2)(b), 51(3)	Special rules for hearings	X	X			
72	Annual report to Parliament	X	X	X		

Privacy Regulations **Provisions and associated descriptions**						
11(2),11 (4)	Notification concerning corrections	X	X	X	X	X
13(1)	Disclosure of personal information relating to physical or mental health	X	X	X		
14	Examination in presence of medical practitioner or psychologist	X	X	X		

The following portion of the Delegation Order applies to records and information that are created, collected, maintained, used and disclosed by the Office of the Veterans Ombudsman.

Position	*Privacy Act*	*Privacy Regulations*
Veterans Ombudsman	Full delegation	Full delegation
Director General of Operation	Full delegation	Full delegation
Legal Advisor	Full delegation	Full delegation
Director of Corporate Services and Charlottetown Operations	Full delegation	Full delegation



Minister of Veterans Affairs

APR 24 2012

Date

Annex 2: Statistical Report on the *Privacy Act* (VAC and OVO)

Government of Canada / Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: Veterans Affairs Canada

Reporting period: 2012/04/01 to 2013/03/31

PART 1 – Requests under the *Privacy Act*

	Number of Requests
Received during reporting period	391
Outstanding from previous reporting period	173
Total	564
Closed during reporting period	272
Carried over to next reporting period	292

PART 2 – Requests closed during the reporting period

2.1 Disposition and completion time

Disposition of requests	Completion Time							
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	More than 365 days	Total
All disclosed	13	42	26	13	11	8	3	116
Disclosed in part	4	18	17	12	11	26	24	112
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	5	7	1	1	0	1	1	16
Request abandoned	18	2	0	1	0	5	2	28
Total	40	69	44	27	22	40	30	272

2.2 Exemptions

Section	Number of requests	Section	Number of requests	Section	Number of requests
18(2)	0	22(1)(a)(i)	1	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	103
19(1)(f)	0	22.1	0	27	9
20	0	22.2	0	28	2
21	1	22.3	0		

TBS/SCT 350-63 (Rev. 2011/03) 1 Canada

2.3 Exclusions

Section	Number of requests	Section	Number of requests	Section	Number of requests
69(1)(a)	0	70(1)(a)	0	70(1)(d)	0
69(1)(b)	0	70(1)(b)	0	70(1)(e)	0
69.1	0	70(1)(c)	0	70(1)(f)	0
				70.1	0

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	109	7	0
Disclosed in part	89	23	0
Total	198	30	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of requests	Number of pages processed	Number of pages disclosed	Number of requests
All disclosed	21349	10365	116
Disclosed in part	92404	52302	112
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	613	0	28

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less than 100 pages processed		101-500 pages processed		501-1000 pages processed		1001-5000 pages processed		More than 5000 pages processed	
	Number of Requests	Pages disclosed	Number of Requests	Pages disclosed	Number of Requests	Pages disclosed	Number of Requests	Pages disclosed	Number of Requests	Pages disclosed
All disclosed	81	979	24	2073	8	1715	3	5598	0	0
Disclosed in part	35	1541	40	10280	20	13571	15	22357	2	4553
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Abandoned	27	0	0	0	0	0	1	0	0	0
Total	143	2520	64	12353	28	15286	19	27955	2	4553

2.5.3 Other complexities

Disposition	Consultation required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	7	1	0	0	8
Disclosed in part	40	0	0	0	40
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Abandoned	0	3	0	0	3
Total	47	4	0	0	51

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of requests closed past the statutory deadline	Principal Reason			
	Workload	External consultation	Internal consultation	Other
132	132	0	0	0

2.6.2 Number of days past deadline

Number of days past deadline	Number of requests past deadline where no extension was taken	Number of requests past deadline where an extension was taken	Total
1 to 15 days	7	4	11
16 to 30 days	6	4	10
31 to 60 days	7	7	14
61 to 120 days	8	9	17
121 to 180 days	16	5	21
181 to 365 days	43	0	43
More than 365 days	15	1	16
Total	102	30	132

2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	1	0	1
Total	1	0	1

PART 3 – Disclosures under subsection 8(2)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Total
7	0	7

PART 4 – Requests for correction of personal information and notations

	Number
Requests for correction received	2
Requests for correction accepted	0
Requests for correction refused	1
Notations attached	0

PART 5 – Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of requests where an extension was taken	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation or conversion
		Section 70	Other	
All disclosed	0	0	29	0
Disclosed in part	7	0	25	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	1	0
Request abandoned	0	0	0	0
Total	7	0	55	0

5.2 Length of extensions

Length of extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	7	0	55	0
Total	7	0	55	0

PART 6 – Consultations received from other institutions and organizations

6.1 Consultations received from other government institutions and organizations

Consultations	Other government institutions	Number of pages to review	Other organizations	Number of pages to review
Received during the reporting period	2	28	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	2	28	0	0
Closed during the reporting period	2	28	0	0
Pending at the end of the reporting period	0	0	0	0

6.2 Recommendations and completion time for consultations received from other government institutions

Recommendation	Number of days required to complete consultation requests							
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	than 365 days	Total
Disclose entirely	2	0	0	0	0	0	0	2
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	2	0	0	0	0	0	0	2

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	than 365 days	Total
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

PART 7 – Completion time of consultations on Cabinet confidences

Number of days	Number of responses received	Number of responses received past deadline
1 to 15	0	0
16 to 30	0	0
31 to 60	0	0
61 to 120	0	0
121 to 180	0	0
181 to 365	0	0
More than 365	0	0
Total	0	0

PART 8 – Resources related to the *Privacy Act*

8.1 Costs

Expenditures		Amount
Salaries		$1,219,552
Overtime		$50,000
Goods and Services		$263,263
• Contracts for privacy impact assessments	$131,037	
• Professional services contracts	$0	
• Other	$132,226	
Total		**$1,532,815**

8.2 Human Resources

Resources	Dedicated full-time	Dedicated part-time	Total
Full-time employees	14.34	2.00	16.34
Part-time and casual employees	1.84	1.78	3.62
Regional staff	0.00	0.00	0.00
Consultants and agency personnel	0.00	0.00	0.00
Students	0.18	0.32	0.50
Total	16.36	4.10	20.46

Annex A of the Statistical Report on the *Privacy Act* (VAC and OVO)

Previously released ATI package released informally

Institution	Number of informal releases of previously released ATI packages
VAC and OVO	12

Completed Privacy Impact Assessments (PIAs)

Institution	Number of Completed PIAs
VAC and OVO	8

Annex 3: Statistical Report on the *Privacy Act* (OVO)

Government of Canada / Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: Office of the Veterans Ombudsman

Reporting period: 2012/04/01 to 2013/03/31

PART 1 – Requests under the *Privacy Act*

	Number of Requests
Received during reporting period	0
Outstanding from previous reporting period	0
Total	0
Closed during reporting period	0
Carried over to next reporting period	0

PART 2 – Requests closed during the reporting period

2.1 Disposition and completion time

Disposition of requests	Completion Time							
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	More than 365 days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

2.2 Exemptions

Section	Number of requests	Section	Number of requests	Section	Number of requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	0
19(1)(f)	0	22.1	0	27	0
20	0	22.2	0	28	0
21	0	22.3	0		

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2.3 Exclusions

Section	Number of requests	Section	Number of requests	Section	Number of requests
69(1)(a)	0	70(1)(a)	0	70(1)(d)	0
69(1)(b)	0	70(1)(b)	0	70(1)(e)	0
69.1	0	70(1)(c)	0	70(1)(f)	0
				70.1	0

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	0	0	0
Disclosed in part	0	0	0
Total	0	0	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of requests	Number of pages processed	Number of pages disclosed	Number of requests
All disclosed	0	0	0
Disclosed in part	0	0	0
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less than 100 pages processed		101-500 pages processed		501-1000 pages processed		1001-5000 pages processed		More than 5000 pages processed	
	Number of Requests	Pages disclosed	Number of Requests	Pages disclosed	Number of Requests	Pages disclosed	Number of Requests	Pages disclosed	Number of Requests	Pages disclosed
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Abandoned	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

2.5.3 Other complexities

Disposition	Consultation required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	0	0	0	0
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Abandoned	0	0	0	0	0
Total	0	0	0	0	0

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of requests closed past the statutory deadline	Principal Reason			
	Workload	External consultation	Internal consultation	Other
0	0	0	0	0

2.6.2 Number of days past deadline

Number of days past deadline	Number of requests past deadline where no extension was taken	Number of requests past deadline where an extension was taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	0	0	0

2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

PART 3 – Disclosures under subsection 8(2)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Total
0	0	0

PART 4 – Requests for correction of personal information and notations

	Number
Requests for correction received	0
Requests for correction accepted	0
Requests for correction refused	0
Notations attached	0

PART 5 – Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of requests where an extension was taken	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation or conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	0	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	0	0	0	0

5.2 Length of extensions

Length of extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	0	0	0	0
Total	0	0	0	0

PART 6 – Consultations received from other institutions and organizations

6.1 Consultations received from other government institutions and organizations

Consultations	Other government institutions	Number of pages to review	Other organizations	Number of pages to review
Received during the reporting period	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	0	0	0	0
Closed during the reporting period	0	0	0	0
Pending at the end of the reporting period	0	0	0	0

6.2 Recommendations and completion time for consultations received from other government institutions

Recommendation	Number of days required to complete consultation requests							
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	than 365 days	Total
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							
	1 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	than 365 days	Total
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

PART 7 – Completion time of consultations on Cabinet confidences

Number of days	Number of responses received	Number of responses received past deadline
1 to 15	0	0
16 to 30	0	0
31 to 60	0	0
61 to 120	0	0
121 to 180	0	0
181 to 365	0	0
More than 365	0	0
Total	0	0

PART 8 – Resources related to the *Privacy Act*

8.1 Costs

Expenditures		Amount
Salaries		$54,552
Overtime		$0
Goods and Services		$33,276
• Contracts for privacy impact assessments	$31,050	
• Professional services contracts	$0	
• Other	$2,226	
Total		$87,828

8.2 Human Resources

Resources	Dedicated full-time	Dedicated part-time	Total
Full-time employees	0.00	2.00	2.00
Part-time and casual employees	0.00	0.50	0.50
Regional staff	0.00	0.00	0.00
Consultants and agency personnel	0.00	0.00	0.00
Students	0.00	0.00	0.00
Total	0.00	2.50	2.50

Annex A of the Statistical Report on the *Privacy Act* (OVO)

Previously released ATI package released informally

Institution	Number of informal releases of previously released ATI packages
Office of the Veterans Ombudsman	nil

Completed Privacy Impact Assessments (PIAs)

Institution	Number of Completed PIAs
Office of the Veterans Ombudsman	1

Annex 4: Five-Year Statistical Analysis (VAC and OVO)

	2008–2009	2009–2010	2010–2011	2011–2012	2012–2013	Variance 2012–2013 and 2011–2012
Requests received	141	172	340	341	391	15%
Requests carried forward from prior year	5	17	15	94	173	84%
Total requests requiring action	146	189	355	435	564	30%
Completed requests	129	174	259	262	272	4%
Requests carried forward to next year	17	15	94	173	292	69%
Completed in 30 days or less	118	154	177	108	109	1%
Completed in 31 days or more	10	20	82	154	163	6%
Exemptions invoked	81	125	170	157	116	-26%
Extensions	2	10	7	3	0	-100%
***Privacy Act* -Total costs of administration**	$497,998	$684,735	$1,164,723	$1,137,586	$1,532,815	35% (or +$395,229)
Salaries	$466,780	$659,390	$1,130,058	$950,336	$1,269,552	34% (or +$319,216)
FTEs	8.70	10.14	13.71	16.79	20.46	20% or +3.67
Operations and Maintenance costs	$31,220	$25,345	$34,665	$187,250	$263,263	41% (or +$76,013)
Complaints received	5	3	9	32	48	50%
Complaints ruled on	4	5	4	17	15	-12%
PIAs completed	1	6	0	0	8	N/A